

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

MICHAEL GRASSI and CFOM, INC.,)	
)	
Plaintiffs-Counterclaim Defendants,)	Case No. 1:18-cv-2619
)	
v.)	JUDGE PAMELA BARKER
)	
)	
JOHN GRASSI and ALOTECH LIMITED,)	
)	
LLC,)	
)	
Defendants-Counterclaimants.)	
)	

DEFENDANTS’ NOTICE OF DEPOSITION TESTIMONY DESIGNATIONS

Defendants John Grassi and Alotech Limited, LLC (“Defendants”), hereby identify the following deposition designations to be introduced at trial.

1. Defendants’ designations from the Videotaped Deposition of Dr. John Campbell, taken September 9, 2022:

Page 6, Lines 3 – 12

Page 7, Lines 5 – 18

Page 8, Line 13 – Page 13, Line 10

Page 14, Lines 6 – 16

Page 14, Line 20 – Page 16, Line 7

Page 16, Line 8 – Page 17, Line 16

Page 19, Lines 6 – 17

Page 19, Line 19 – Page 23, Line 18

Page 23, Line 20 – Page 27, Line 14

Page 27, Lines 16 – 18

Page 27, Lines 19 – 22

Page 27, Line 23 – Page 28, Line 7

Page 28, Lines 8 – 17

Page 30, Line 24 – Page 31, Line 11

Page 31, Lines 13 – 20

Page 31, Line 22 – Page 32, Line 15

Page 33, Line 13 – Page 35, Line 6

Page 35, Lines 7 – 23

Page 36, Line 12 – Page 37, Line 23

Page 44, Lines 5 – 23

Page 46, Line 25 – Page 47, Line 18

Page 48, Lines 1 – 4

2. Defendants' designations from the Deposition of Vicki Hawker, taken May 21, 2019:

Page 5, Lines 22 – 24

Page 6, Lines 18 – 19

Page 7, Line 8 – Page 8, Line 2

Page 8, Line 9 – Page 9, Line 19

Page 11, Line 15 – Page 12, Line 10

Page 14, Lines 19 – 21

Page 28, Line 25 – Page 29, Line 11

Page 30, Lines 1 – 10

Page 33, Line 4 – Page 35, Line 15

Page 43, Line 10 – Page 44, Line 9

Page 46, Lines 4 – 16

Page 52, Lines 18 – 21

Page 55, Lines 10 – 25

Page 57, Line 11 – Page 58, Line 3

Page 59, Lines 8 – 20

Page 61, Line 24 – Page 63, Line 7

Page 65, Line 7 – Page 66, Line 20

Respectfully submitted, this 28th day of November, 2022.

/s/ Suzanne Bretz Blum

Suzanne Bretz Blum (0047231)
Brouse McDowell
600 Superior Avenue East, Suite 1600
Cleveland, Ohio 44114
P: (216) 830-6830 / F: (216) 830-6807
sblum@brouse.com

/s/ John M. Moye

John M. Moye (GA Bar 685211)*
Barnes & Thornburg LLP
3340 Peachtree Road, Suite 2900
Atlanta, Georgia 30326
P: (404) 264-4006 / F: (404) 264-4003
jmoye@btlaw.com

/s/ Cole Ramey

Cole Ramey (TX Bar No. 16494980)*
Kilpatrick Townsend & Stockton, LLP
2001 Ross Avenue, Suite 4400
Dallas, Texas 75201
P: (214) 922-7100 / F: (214) 922-7101
cramey@kilpatricktownsend.com

/s/ Steven Moore

Steven Moore (CA Bar No. 290875)*
Kilpatrick Townsend & Stockton, LLP
Two Embarcadero Center, Suite 1900
San Francisco, CA 94111
P: (415) 273-4741 / F: (415) 651-8510
smoore@kilpatricktownsend.com

* Admitted *Pro Hac Vice*
Counsel for Defendants

CERTIFICATE OF FILING AND SERVICE

I hereby certify that on November 28, 2022, I electronically filed the foregoing **DEFENDANTS' NOTICE OF DEPOSITION TESTIMONY DESIGNATIONS** via the Court's ECF system. I further certify that counsel of record for Plaintiffs is a registered ECF user and that service will be accomplished by the ECF system.

/s/ John M. Moye

John M. Moye (GA Bar 685211)

Counsel for Defendants